## City of Minneapolis comments on the Minnesota Multi-Purpose Stadium Final EIS

1. Traffic Analysis and Other Transportation Analysis

On page 3-28 and other pages - The City appreciates conversion of  $6^{th}$  Street to two-way operation between Park and  $11^{th}$  Avenues and recognizes the conversion as substantial mitigation for the impacts of the  $5^{th}$  Street closure on the roadway network pending a detailed design of  $6^{th}$  Street that is adequate to safely serve all modes of transportation.

On page 3-33 – The City disagrees with the statement that, "Event arrival was generally uncongested."

On page 3-34 – The City disagrees with the omission of 3<sup>rd</sup> Street from the roads listed which undergo significant congestion during event departures. The second bullet on the page lists only Washington Avenue, 11<sup>th</sup> Avenue, 6<sup>th</sup> Street, and Park Avenue.

On page 3-47 – Table 3.7-16 indicates that a concert might be held at the stadium any evening of the week. Concert events have the potential to impact traffic more than a Vikings Game. Concert events will have to be addressed in the Minnesota Multi-Purpose Stadium Traffic Management Plan.

On page 3-51 – A Traffic Management Plan for all modes of travel will be critical to a positive event experience for game days as well as other minor and major stadium events. A copy of the Twins Ballpark Traffic Management Plan is attached to these comments and could be used as an example to consider in the Traffic Management Plan preparation process for the Minnesota Multi-Purpose Stadium.

On pages 3-60 through 3-63 – The City appreciates the additional pedestrian analysis and looks forward to coordinating optimal design of pedestrian facilities with stadium designers.

On page 3-66 – The City concurs with the recommended measures to facilitate transit ridership and to minimize or reduce the conflicts between pedestrians and LRT at the 4<sup>th</sup> Street/Chicago Avenue intersection during events.

On pages 3-67 and 6-46 –The expansion of the plaza area should include the area bounded by Park Avenue, 4<sup>th</sup> Street and the Downtown East LRT station. The City disagrees with the omission of that expansion as a mitigation measure. If adequate queuing space is not provided, then the ridership projections used for the EIS will not be realized and game-day transportation conditions will be worse than projected in the EIS and the mitigation measures in the EIS will not suffice.

## 2. Groundwater and Stormwater

On page 3-5 – It is not the City's understanding that the existing Metrodome groundwater interception system is pumped solely to the sanitary sewer system. This statement also contradicts later statements in the EIS identifying the groundwater interception system as being discharged to both storm and sanitary. As plans are developed, verification of the existing system should be provided as it will likely influence decisions on any proposed groundwater pumping.

On page 3-5 – The City does not feel it has been adequately demonstrated that the proposed groundwater pumping will be reduced from the existing conditions. Additional review of any proposed groundwater pumping activities must be completed as plans progress.

On page 3-5 – Discharge of groundwater to the storm sewer system is subject to approval by the City. Several issues must be addressed, including but not limited to water quality, quantity and volume. The City looks forward to receiving additional information related to any proposed groundwater discharges.

On page 3-5 – The appropriate location of any proposed groundwater discharge into the storm sewer system has not been fully evaluated. The discharge connection should occur in the location that provides the greatest benefit in relation to several groundwater and storm water characteristics, including but not limited to quality, quantity and volume. The appropriate location should be determined once additional information and plans have been developed.

General – Upon receipt of project details, the City of Minneapolis and Minnesota Sports Facility Authority must enter into an agreement incorporating relevant groundwater information including but not limited to identifying permitting requirements, water quality and peak rates, connection size and locations, change conditions and responsibility.

On page 3-6 – In the No Action Alternative, the Metrodome would likely not continue to function as it currently does. As has been stated in the EIS, the site currently does not have a DNR Water Appropriations Permit even though the thresholds requiring a permit are being exceeded. Discharge of groundwater to the City sanitary sewer could also be subject to metering and charges. Should the No Action Alternative be applied, additional conversations will be necessary on these topics. Similar comment to the No Action Alternative on page 3-17.

On page 3-7 – The erosion and sediment control measures planned for use during and after construction will also need to meet or exceed the requirements of Title 3, Chapter 52 of the Minneapolis Code of Ordinances. The City looks forward to reviewing plans once they have been developed.

On page 3-10 – Should regional stormwater treatment be proposed for the Downtown East Block, or any other sites within the project area, appropriate easements, agreements and encroachment permits will be required to be provided in order to be considered in compliance with Title 3, Chapter 54 of the Minneapolis Code of Ordinances. As plans are developed, consideration should be given to these easements, agreements and encroachment permits.

On page 3-11 – The Proposed Project will be subject to the rate control and water quality requirements of Title 3, Chapter 54 of the Minneapolis Code of Ordinances. While the City does not have a volume control requirement, it does encourage volume control measures where site conditions are suitable. Review for compliance with Chapter 54 will be completed upon further development of plans.

On page 3-10 to 3-11 – Title 3, Chapter 54 of the Minneapolis Code of Ordinances requires discharge rates to the various systems to be maintained at or below existing rates. Review of any proposed discharges and connection locations will be completed upon further development of plans.

On page 3-16 — City records indicate a 60-inch sewer in 11th Avenue. The City will further review the appropriateness of the proposed connection locations upon further development of plans.

On page 3-16 – Earlier in the EIS it had been stated that the groundwater dewatering discharge would be directed to the storm sewer system. The groundwater discharge volumes identified here also conflict with those identified earlier in the EIS. Further analysis of the proposed groundwater pumping activities must be completed to provide accurate and consistent information to the City.

On page 58 – In response to the City's comment that the potential for contamination migration due to the proposed groundwater pumping should be evaluated, it was stated that the volume of groundwater to be pumped will be comparable to the volume pumped at the Metrodome. It is the City's understanding that additional evaluation of proposed groundwater pumping will be completed and that the volume may not be comparable. It is also stated that the present dewatering effluent and storm drainage are directed to the sanitary sewer from internal areas. This is not the City's understanding of the existing conditions.